

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF PENNSYLVANIA**

In re: WELLBUTRIN XL ANTITRUST LITIGATION)	Case No. 2:08-cv-2431 (direct) Case No. 2:08-cv-2433 (indirect) STIPULATION CONCERNING DEPOSITIONS
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THIS DOCUMENT RELATES TO:)	
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ALL ACTIONS)	
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STIPULATION CONCERNING DEPOSITIONS

Aetna Health of California, Inc., Plumbers and Pipefitters Local 572 Health and Welfare Fund, IBEW-NECA Local 505 Health and Welfare Plan, and Painters District Council No. 30 Health and Welfare Fund (collectively “Indirect Purchaser Plaintiffs”) and Professional Drug Co., Inc. (“Direct Purchaser Plaintiff”), SmithKline Beecham Corporation and GlaxoSmithKline plc (collectively “GSK”), and Biovail Corporation, Biovail Laboratories, Inc., and Biovail Laboratories International SRL (collectively “Biovail,” collectively with GSK “defendants”) hereby agree as follows:

1. The Direct Purchaser Plaintiff and Indirect Purchaser Plaintiffs will collectively be allowed to take forty-five (45) depositions without seeking leave of court. Additional depositions will be available upon Court Order for good cause shown. Of the 45 depositions that plaintiffs are allowed to take without leave of court, no more than 20 may be current or former GSK employees and no more than 22 may be current or former Biovail employees.

2. GSK and Biovail will collectively be allowed to take twenty-five (25) depositions without seeking leave of court. Additional depositions will be available upon

Court order for good cause shown. Of the twenty-five depositions that defendants are allowed to take without leave of court, no more than six may be current or former employees of the current Direct Purchaser Plaintiff, no more than five may be current or former employees of Aetna Health of California, Inc., no more than two may be current or former employees of Plumbers and Pipefitters Local 572 Health and Welfare Fund, no more than two may be current or former employees of IBEW-NECA Local 505 Health and Welfare Plan, and no more than two may be current or former employees of Painters District Council No. 30 Health and Welfare Fund.

3. The parties agree to work in good faith to ensure that attending attorneys from all parties have adequate time for cross-examination.

Dated: February 28, 2011

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